

EXHIBIT BB

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9 *CHECKMATE.COM INC.*

10
11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13
14 ARJUN VASAN,

15 Plaintiff,

16 v.

17
18 CHECKMATE.COM, INC.,

19 Defendant.

20
21 CHECKMATE.COM, INC.,

22 Counterclaim-Plaintiff,

23 v.

24
25 ARJUN VASAN,

26 Counterclaim-
27 Defendant.

Case No. 2:25-CV-00765-MEMF-JPR

Magistrate Judge Jean P. Rosenbluth

**CHECKMATE.COM, INC.'S
RESPONSES TO PLAINTIFF
ARJUN VASAN'S THIRD SET OF
REQUESTS FOR ADMISSIONS**

Complaint Filed: January 28, 2025
Amended Complaint Filed: February
21, 2025

1 PROPOUNDING PARTY: PLAINTIFF ARJUN VASAN
2 RESPONDING PARTY: DEFENDANT CHECKMATE.COM, INC.
3 SET NO.: THREE (3)

4 Defendant Checkmate.com, Inc. (“Defendant” or “Checkmate”) hereby
5 responds to Plaintiff Arjun Vasani (“Plaintiff” or “Vasani”)’s Third Set of Requests
6 for Admission (the “Requests”), as follows:

7 **PRELIMINARY STATEMENT**

8 Checkmate’s investigation of the facts relating to this case is still ongoing. As
9 such, Checkmate has not completed its investigation, has not completed discovery,
10 and has not completed preparation for trial. All of the answers contained herein are
11 based upon the information presently available, and specifically known, to
12 Checkmate. It is anticipated that further discovery and further independent
13 investigation will supply additional facts which may clarify and add meaning to facts
14 presently known, as well as establish new factual matters, all of which may lead to
15 substantial addition to, changes in, and variations from the responses set forth herein.
16 The following responses are given without prejudice to Checkmate’s right to produce
17 evidence of any subsequently discovered fact or facts that Checkmate may later recall.

18 The responses contained herein are made in a good faith effort to supply as
19 much factual information as is presently known, but should in no way be to the
20 prejudice of these parties in relationship to further discovery, research, or analysis.
21 Checkmate reserves the right to alter, supplement, amend, or otherwise modify these
22 responses in any way and at any time, including at or during trial, in light of facts
23 revealed to them through discovery, further investigation, or further legal analysis.
24 Checkmate also reserves the right to amend or supplement these responses with any
25 information that has been inadvertently or unintentionally omitted and/or to introduce
26 such information into evidence at the time of hearing or trial.

27 Checkmate makes these responses to the Requests subject to, and without
28 waiving in any way any objections as to competence, relevance, materiality, propriety,

1 and admissibility, and any and all other objections and grounds which would require
2 the exclusion of any statement herein if the Requests were asked of, or any statements
3 contained were made by, a witness present and testifying in Court, all of which
4 objections and grounds are reserved and may be interposed at time of trial.

5 **GENERAL OBJECTIONS**

6 1. To the extent the Requests call for confidential communications between
7 Checkmate and any of its/his/her attorneys, or information that is otherwise covered
8 by the attorney-client privilege, the work-product doctrine, or any other right or
9 privilege recognized by California or federal law, Checkmate generally objects to the
10 Requests, and each request contained therein.

11 2. Checkmate objects to the Requests, and each request contained therein,
12 to the extent that they seek information protected by the California or United States
13 constitutions, California or federal statutes or case law that establish a right of privacy
14 and forbid the discovery and dissemination of confidential, sensitive and financial
15 information. Checkmate will not reveal such information where doing so would
16 violate the privacy rights of Checkmate or of third parties.

17 3. Checkmate objects to the Requests, and each request contained therein,
18 to the extent that they seek information that is not relevant and/or material to the
19 subject matter of this litigation or are not reasonably calculated to lead to the
20 discovery of admissible evidence.

21 4. Checkmate objects to the Requests, and each request contained therein,
22 insofar as they are repetitive, redundant or overlapping.

23 5. Checkmate objects to the Requests, and each request contained therein,
24 to the extent that they are unduly burdensome, oppressive, annoying or harassing.

25 6. Checkmate objects to the Requests, and each request contained therein,
26 to the extent that they are vague and ambiguous, compound, confusing, unintelligible,
27 unclear and amenable to different meanings, understandings or interpretations.
28 Checkmate is responding to each Request as it interprets and understands that Request

1 with respect to the issues framed in connection with this litigation. If Checkmate
2 asserts an interpretation of any part of a Request that differs from the understanding
3 of Checkmate, Checkmate reserves the right to supplement, amend, or modify their
4 responses or objections.

5 7. Checkmate objects to the Requests, and to each request contained
6 therein, to the extent they are unlimited in time or seek information beyond the time-
7 frame relevant to this litigation on the grounds that they are overbroad and unduly
8 burdensome and seek information that is irrelevant to the subject matter of this
9 litigation.

10 8. Checkmate objects to the Requests, and each request contained therein,
11 to the extent they seek to impose duties or obligations different from, additional to, or
12 otherwise beyond those required by the Federal Rules of Civil Procedure.

13 9. Checkmate objects to the Requests, and each request therein, to the
14 extent they seek information that is equally available to or within Plaintiff's
15 possession, custody or control on the grounds that such Requests are unduly
16 burdensome and oppressive.

17 10. Checkmate objects to the definition of "You/Checkmate" in that it is
18 vague, ambiguous, overbroad, and reflects an attempt to circumvent Federal Rule of
19 Civil Procedure 45. It is also objectionable to the extent it intrudes upon the
20 attorney/client privilege, work product, and/or other applicable privileges.

21 11. Checkmate objects to the definition of "Separation Meeting" in that it is
22 vague, ambiguous, overbroad, and unduly burdensome.

23 12. Checkmate objects to the definition of "#voicemate" in that it is vague,
24 ambiguous, overbroad, and unduly burdensome.

25 13. Checkmate objects to the definition of "BYOD Policy" in that it is vague,
26 ambiguous, and overbroad, and unduly burdensome.

27 14. Checkmate objects to the definition of "May Slack Thread" in that it is
28 vague, ambiguous, and overbroad, and unduly burdensome.

1 15. Checkmate objects to the definition of “Oct. 14 DM” in that it is vague,
2 ambiguous, and overbroad, and unduly burdensome.

3 16. Checkmate objects to the definition of “HR Write-Up” in that it is vague,
4 ambiguous, and overbroad, and unduly burdensome.

5 17. Checkmate objects to the definition of “Closing Spreadsheet” in that it
6 is vague, ambiguous, and overbroad, and unduly burdensome.

7 18. The foregoing objections are incorporated by reference into each of the
8 specific responses made herein. Notwithstanding the specific responses to any of the
9 Requests, Checkmate does not waive any of the general or specific objections made
10 herein.

11 19. Subject to and without waiving the foregoing General Objections,
12 Checkmate responds to Vasani’s Third Set of Requests for Admissions as follows:

13 **RESPONSES TO REQUESTS FOR ADMISSION**

14 **REQUEST FOR ADMISSION NO. 71:**

15 Admit that Vishal Agarwal was CEO between May-November 2024 and had
16 authority over hiring, discipline, and termination decisions.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 71:**

18 Responding Party hereby incorporates the General Objections as though fully
19 set forth herein. Responding Party objects to this Request on the grounds that the
20 terms “was CEO,” “had authority,” and “hiring, discipline, and termination decisions”
21 are vague, ambiguous, and overbroad. Responding Party further objects that the
22 Request is compound, containing multiple distinct inquiries within a single request,
23 which is improper under the applicable Rules.

24 **REQUEST FOR ADMISSION NO. 72:**

25 Admit that Michael Bell was Chief of Strategy between May-November 2024
26 and was Plaintiff’s direct supervisor.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 72:**

28 Responding Party hereby incorporates the General Objections as though fully

1 set forth herein. Responding Party objects to this Request on the grounds that the
2 terms “direct supervisor” are vague, ambiguous, and overbroad. Responding Party
3 further objects that the Request is compound, containing multiple distinct inquiries
4 within a single request, which is improper under the applicable Rules.

5 **REQUEST FOR ADMISSION NO. 73:**

6 Admit that the BYOD Policy applied to Plaintiff in 2024.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 73:**

8 Responding Party hereby incorporates the General Objections as though fully
9 set forth herein. Responding Party objects to this Request on the grounds that the term
10 “BYOD Policy,” as defined by Plaintiff, is vague, ambiguous, overbroad, and unduly
11 burdensome. Responding Party further objects that the terms “applied to” are vague,
12 ambiguous, and overbroad. Responding Party further objects that the Request calls
13 for a legal conclusion rather than a factual response.

14 Without waiving the foregoing objections, Responding Party responds as
15 follows: at all times during his employment, Plaintiff was subject to the policies and
16 procedures of Responding Party, including the policies and procedures of Responding
17 Party relating to the use of personal devices for work purposes.

18 **REQUEST FOR ADMISSION NO. 74:**

19 Admit that under the BYOD Policy, Plaintiff was required to use his personal
20 device for work and to install monitoring/MDM software.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 74:**

22 Responding Party hereby incorporates the General Objections as though fully
23 set forth herein. Responding Party objects to this Request on the grounds that the term
24 “BYOD Policy,” as defined by Plaintiff, is vague, ambiguous, overbroad, and unduly
25 burdensome. Responding Party further objects that the terms “was required to use”
26 and “and to install monitoring/MDM software” are vague, ambiguous, and overbroad.
27 Responding Party further objects that the Request is compound, containing multiple
28 distinct inquiries within a single request, which is improper under the applicable

Rules.

REQUEST FOR ADMISSION NO. 75:

Admit that during May-November 2024, Checkmate did not provide Plaintiff a company-owned laptop.

RESPONSE TO REQUEST FOR ADMISSION NO. 75:

Responding Party hereby incorporates the General Objections as though fully set forth herein. Responding Party objects to this Request on the grounds that the term “Checkmate,” as defined by Plaintiff, is vague, ambiguous, overbroad, and unduly burdensome. Responding Party further objects to this Request to the extent it seeks information protected from disclosure by the attorney-client privilege and/or the work product doctrine. Responding Party further objects that the terms “company-owned” are vague, ambiguous, and overbroad.

Without waiving the foregoing objections, Responding Party responds as follows: Deny.

REQUEST FOR ADMISSION NO. 76:

Admit that during May-November 2024, Checkmate did not reimburse Plaintiff for the purchase of a separate device for exclusive work use.

RESPONSE TO REQUEST FOR ADMISSION NO. 76:

Responding Party hereby incorporates the General Objections as though fully set forth herein. Responding Party objects to this Request on the grounds that the term “Checkmate,” as defined by Plaintiff, is vague, ambiguous, overbroad, and unduly burdensome. Responding Party further objects to this Request to the extent it seeks information protected from disclosure by the attorney-client privilege and/or the work product doctrine. Responding Party further objects that the terms “separated device” and “exclusive work use” are vague, ambiguous, and overbroad.

Without waiving the foregoing objections, Responding Party responds as follows: Deny.

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1 **REQUEST FOR ADMISSION NO. 77:**

2 Admit that upon close of the merger, VoiceBite provided a Closing
3 Spreadsheet that detailed, among other things, expenses of the VoiceBite founders
4 to be reimbursed for VoiceBite property they personally purchased upon closing.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 77:**

6 Responding Party hereby incorporates the General Objections as though fully
7 set forth herein. Responding Party objects to this Request on the grounds that the term
8 “Closing Spreadsheet,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
9 unduly burdensome. Responding Party further objects that the terms “that detailed”
10 and “among other things” are so vague, ambiguous, and overbroad as to render the
11 Request unintelligible. Responding Party further objects that the terms “upon close of
12 the merger,” “VoiceBite property,” and “upon closing” are vague, ambiguous, and
13 overbroad. Responding Party further objects that the Request is compound, containing
14 multiple distinct inquiries within a single request, which is improper under the
15 applicable Rules.

16 **REQUEST FOR ADMISSION NO. 78:**

17 Admit that this spreadsheet listed VoiceBite laptops for Robert Nessler and
18 Christopher Lam, but Plaintiff did not have a VoiceBite laptop and did not expense
19 his personal laptop.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 78:**

21 Responding Party hereby incorporates the General Objections as though fully
22 set forth herein. Responding Party objects to this Request on the grounds that the
23 terms “this spreadsheet” are so vague, ambiguous, and overbroad as to render the
24 Request unintelligible. Responding Party further objects that the terms “listed
25 VoiceBite laptops” and “expense” are vague, ambiguous, and overbroad. Responding
26 Party further objects that the Request is compound, containing multiple distinct
27 inquiries within a single request, which is improper under the applicable Rules.

28 ///

1 **REQUEST FOR ADMISSION NO. 79:**

2 Admit that on Plaintiff's first day as a Checkmate employee, he raised the issue
3 of the BYOD Policy conflicting with California Law in a private Slack thread with
4 Agarwal.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 79:**

6 Responding Party hereby incorporates the General Objections as though fully
7 set forth herein. Responding Party objects to this Request on the grounds that the term
8 "BYOD Policy," as defined by Plaintiff, is vague, ambiguous, overbroad, and unduly
9 burdensome. Responding Party further objects that the terms "raised the issue,"
10 "conflicting with California Law," and "in a private Slack thread" are so vague,
11 ambiguous, and overbroad as to render the Request unintelligible.

12 Without waiving the foregoing objections, Responding Party responds as
13 follows: Given that the Request is unintelligible, Responding Party lacks the ability
14 to admit or deny it, and on that basis denies the Request.

15 **REQUEST FOR ADMISSION NO. 80:**

16 Admit that Plaintiff stated in the thread: "in california it's not even legal
17 though... california employers must provide the work equipment for employees."

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 80:**

19 Responding Party hereby incorporates the General Objections as though fully
20 set forth herein. Responding Party objects to this Request on the grounds that the
21 terms "stated in the thread" are so vague, ambiguous, and overbroad as to render the
22 Request unintelligible.

23 Without waiving the foregoing objections, Responding Party responds as
24 follows: Given that the Request is unintelligible, Responding Party lacks the ability
25 to admit or deny it, and on that basis denies the Request.

26 **REQUEST FOR ADMISSION NO. 81:**

27 Admit that Plaintiff stated he was not comfortable installing monitoring
28 software on his personal computer and raised concerns about privacy and exposure

1 of personal devices.

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 81:**

3 Responding Party hereby incorporates the General Objections as though fully
4 set forth herein. Responding Party objects to this Request on the grounds that the
5 entirety of the Request is so vague, ambiguous, and overbroad as to render the Request
6 unintelligible. Responding Party further objects that the Request is compound,
7 containing multiple distinct inquiries within a single request, which is improper under
8 the applicable Rules.

9 **REQUEST FOR ADMISSION NO. 82:**

10 Admit that Plaintiff requested a company device rather than installing
11 monitoring software on his personal device.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 82:**

13 Responding Party hereby incorporates the General Objections as though fully
14 set forth herein. Responding Party objects to this Request on the grounds that the
15 terms “requested a company device” and “installing monitoring software” are vague,
16 ambiguous, and overbroad. Responding Party further objects that the Request is
17 compound, containing multiple distinct inquiries within a single request, which is
18 improper under the applicable Rules.

19 **REQUEST FOR ADMISSION NO. 83:**

20 Admit that in the follow-up email, Plaintiff again requested a company device
21 and explained the basis for his request.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 83:**

23 Responding Party hereby incorporates the General Objections as though fully
24 set forth herein. Responding Party objects to this Request on the grounds that the
25 terms “in the follow up-email” are so vague, ambiguous, and overbroad as to render
26 the Request unintelligible. Responding Party further objects that the terms “again
27 requested” and “explained the basis for his request” are vague, ambiguous, and
28 overbroad. Responding Party further objects that the Request is compound, containing

1 multiple distinct inquiries within a single request, which is improper under the
2 applicable Rules.

3 **REQUEST FOR ADMISSION NO. 84:**

4 Admit that Amy Brown emailed or slacked Plaintiff stating that Michael Bell
5 had stated that the entire VoiceBite's teams' laptops were reimbursed.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 84:**

7 Responding Party hereby incorporates the General Objections as though fully
8 set forth herein. Responding Party objects to this Request on the grounds that the
9 terms "emailed or slacked" and "stating that Michael Bell had stated that the entire
10 VoiceBite's teams' laptops were reimbursed" are so vague, ambiguous, and
11 overbroad as to render the Request unintelligible. Responding Party further objects
12 that the Request is compound, containing multiple distinct inquiries within a single
13 request, which is improper under the applicable Rules.

14 **REQUEST FOR ADMISSION NO. 85:**

15 Admit that Amy Brown emailed or slacked Plaintiff stating that Michael Bell
16 had stated that the entire VoiceBite's teams' laptops were reimbursed.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 85:**

18 Responding Party hereby incorporates the General Objections as though fully
19 set forth herein. Responding Party objects to this Request on the grounds that it is
20 duplicative of Request No. 14.

21 **REQUEST FOR ADMISSION NO. 86:**

22 Admit that Checkmate's management did not offer to purchase or reimburse a
23 work laptop.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 86:**

25 Responding Party hereby incorporates the General Objections as though fully
26 set forth herein. Responding Party objects to this Request on the grounds that the term
27 "Checkmate," as defined by Plaintiff, is vague, ambiguous, overbroad, and unduly
28 burdensome. Responding Party further objects to this Request to the extent it seeks

1 information protected from disclosure by the attorney-client privilege and/or the work
2 product doctrine. Responding Party further objects that the term “management” is
3 vague, ambiguous, and overbroad. Responding Party further objects that the Request
4 is compound, containing multiple distinct inquiries within a single request, which is
5 improper under the applicable Rules.

6 **REQUEST FOR ADMISSION NO. 87:**

7 Admit that in the Oct. 14 DM, Plaintiff again raised BYOD
8 legality/compliance and the need for a company device.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 87:**

10 Responding Party hereby incorporates the General Objections as though fully
11 set forth herein. Responding Party objects to this Request on the grounds that the term
12 “Oct. 14 DM,” as defined by Plaintiff, is vague, ambiguous, overbroad, and unduly
13 burdensome. Responding Party further objects that the terms “again raised BYOD
14 legality/compliance” and “the need for a company device” is vague, ambiguous, and
15 overbroad. Responding Party further objects that the Request is compound, containing
16 multiple distinct inquiries within a single request, which is improper under the
17 applicable Rules.

18 **REQUEST FOR ADMISSION NO. 88:**

19 Admit Agarwal rejected Plaintiff’s request for a work laptop, and stated, among
20 other things “Alright then you can’t work for the company.”, “we won’t hire people
21 who are stickler for the law... Is that clear?”.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 88:**

23 Responding Party hereby incorporates the General Objections as though fully
24 set forth herein. Responding Party objects to this Request on the grounds that the
25 terms “among other things” are so vague, ambiguous, and overbroad as to render the
26 Request unintelligible. Responding Party further objects that the terms “rejected
27 Plaintiff’s request” are vague, ambiguous, and overbroad. Responding Party further
28 objects that the Request is compound, containing multiple distinct inquiries within a

1 single request, which is improper under the applicable Rules.

2 **REQUEST FOR ADMISSION NO. 89:**

3 Admit Agarwal escalated the private discussion to the #voicemate group
4 channel.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 89:**

6 Responding Party hereby incorporates the General Objections as though fully
7 set forth herein. Responding Party objects to this Request on the grounds that the
8 terms “the private discussion” and “#voicemate group channel” are so vague,
9 ambiguous, and overbroad as to render the Request unintelligible. Responding Party
10 further objects that the term “#voicemate,” as defined by Plaintiff, is vague,
11 ambiguous, overbroad, and unduly burdensome. Responding Party further objects that
12 the term “escalated” is vague, ambiguous, and overbroad.

13 Without waiving the foregoing objections, Responding Party responds as
14 follows: Given that the Request is unintelligible, Responding Party lacks the ability
15 to admit or deny it, and on that basis denies the Request.

16 **REQUEST FOR ADMISSION NO. 90:**

17 Admit after escalating to #voicemate, Agarwal stated the following:
18 @channel I’m moving a 1:1 conversation I am having with Arjun here and
19 documenting it here for everyone. Arj’s point is that we need to provision equipments
20 and computers in order to hire good engineers. And that this is also a California law.
21 We at this point cannot do that because we have over 300 employees and that cash
22 outlay is huge. The tone from @arj is absolutely in the spirit of creating a problem
23 and creating a confrontation, rather than having a mutual conversation and trying to
24 find a solution with a company he just joined. I wanted to make sure everyone is aware
25 and ask if everyone shares Arj’s belief. If that continues to be the case, I won’t mind
26 having a difficult conversation with the individual at whatever stage of the company
27 to make sure we build a cohesive company for long term benefits.

28 ///

RESPONSE TO REQUEST FOR ADMISSION NO. 90:

Responding Party hereby incorporates the General Objections as though fully set forth herein. Responding Party objects to this Request on the grounds that the terms “after escalating to #voicemate” are so vague, ambiguous, and overbroad as to render the Request unintelligible. Responding Party further objects that the term “#voicemate,” as defined by Plaintiff, is vague, ambiguous, overbroad, and unduly burdensome. Responding Party further objects that the term “escalating” is vague, ambiguous, and overbroad.

Without waiving the foregoing objections, Responding Party responds as follows: Given that the Request is unintelligible, Responding Party lacks the ability to admit or deny it, and on that basis denies the Request.

REQUEST FOR ADMISSION NO. 91:

Admit Agarwal stated in the #voicemate channel “I can also promise if this is how it is going to be going ahead, I’d rather cut my losses right now. No employee is indispensable and I can put that in a formal notice.”

RESPONSE TO REQUEST FOR ADMISSION NO. 91:

Responding Party hereby incorporates the General Objections as though fully set forth herein. Responding Party objects to this Request on the grounds that the terms “#voicemate channel” are so vague, ambiguous, and overbroad as to render the Request unintelligible. Responding Party further objects that the term “#voicemate,” as defined by Plaintiff, is vague, ambiguous, overbroad, and unduly burdensome.

Without waiving the foregoing objections, Responding Party responds as follows: Given that the Request is unintelligible, Responding Party lacks the ability to admit or deny it, and on that basis denies the Request.

REQUEST FOR ADMISSION NO. 92:

Admit that Agarwal stated in the #voicemate channel “The situation is quite clear Arj - you don’t want to use your personal computer for work reasons. We don’t provide work computers. The only solution is for you to quit. Do you know of any

1 other alternative?”

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 92:**

3 Responding Party hereby incorporates the General Objections as though fully
4 set forth herein. Responding Party objects to this Request on the grounds that the
5 terms “#voicemate channel” are so vague, ambiguous, and overbroad as to render the
6 Request unintelligible. Responding Party further objects that the term “#voicemate,”
7 as defined by Plaintiff, is vague, ambiguous, overbroad, and unduly burdensome.

8 Without waiving the foregoing objections, Responding Party responds as
9 follows: Given that the Request is unintelligible, Responding Party lacks the ability
10 to admit or deny it, and on that basis denies the Request.

11 **REQUEST FOR ADMISSION NO. 93:**

12 Admit Agarwal stated in the #voicemate channel “Sure, then we will consult
13 with security and if there is no other alternative, then I am happy to fire
14 you”

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 93:**

16 Responding Party hereby incorporates the General Objections as though fully
17 set forth herein. Responding Party objects to this Request on the grounds that the
18 terms “#voicemate channel” are so vague, ambiguous, and overbroad as to render the
19 Request unintelligible. Responding Party further objects that the term “#voicemate,”
20 as defined by Plaintiff, is vague, ambiguous, overbroad, and unduly burdensome.

21 Without waiving the foregoing objections, Responding Party responds as
22 follows: Given that the Request is unintelligible, Responding Party lacks the ability
23 to admit or deny it, and on that basis denies the Request.

24 **REQUEST FOR ADMISSION NO. 94:**

25 Admit that Plaintiff stated in response or shortly thereafter: “so you will
26 terminate me for pointing out a violation of the law?”

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 94:**

28 Responding Party hereby incorporates the General Objections as though fully

1 set forth herein. Responding Party objects to this Request on the grounds that the
2 terms “stated in response or shortly thereafter” are so vague, ambiguous, and
3 overbroad as to render the Request unintelligible. Responding Party further objects
4 that the Request is compound, containing multiple distinct inquiries within a single
5 request, which is improper under the applicable Rules.

6 **REQUEST FOR ADMISSION NO. 95:**

7 Admit that Plaintiff continued, stating “i think there are laws against that”

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 95:**

9 Responding Party hereby incorporates the General Objections as though fully
10 set forth herein. Responding Party objects to this Request on the grounds that the
11 terms “Plaintiff continued, stating” are so vague, ambiguous, and overbroad as to
12 render the Request unintelligible.

13 Without waiving the foregoing objections, Responding Party responds as
14 follows: Given that the Request is unintelligible, Responding Party lacks the ability
15 to admit or deny it, and on that basis denies the Request.

16 **REQUEST FOR ADMISSION NO. 96:**

17 Admit that Agarwal responded “sure, if that’s the route you want to go I’d
18 rather deal with that headache than the conversation we are having here”

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 96:**

20 Responding Party hereby incorporates the General Objections as though fully
21 set forth herein. Responding Party objects to this Request on the grounds that the
22 terms “Agarwal responded” are so vague, ambiguous, and overbroad as to render the
23 Request unintelligible.

24 Without waiving the foregoing objections, Responding Party responds as
25 follows: Given that the Request is unintelligible, Responding Party lacks the ability
26 to admit or deny it, and on that basis denies the Request.

27 **REQUEST FOR ADMISSION NO. 97:**

28 Admit that Plaintiff re-raised the BYOD issue in a Slack DM to Agarwal on

1 October 14, 2024.

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 97:**

3 Responding Party hereby incorporates the General Objections as though fully
4 set forth herein. Responding Party objects to this Request on the grounds that the
5 terms “Plaintiff re-raised,” “BYOD issue,” and “in a Slack DM” are so vague,
6 ambiguous, and overbroad as to render the Request unintelligible.

7 Without waiving the foregoing objections, Responding Party responds as
8 follows: Given that the Request is unintelligible, Responding Party lacks the ability
9 to admit or deny it, and on that basis denies the Request.

10 **REQUEST FOR ADMISSION NO. 98:**

11 Admit that Agarwal called a meeting with Plaintiff, Michael Bell and Robert
12 Nessler.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 98:**

14 Responding Party hereby incorporates the General Objections as though fully
15 set forth herein. Responding Party objects to this Request on the grounds that the
16 terms “called a meeting” are so vague, ambiguous, and overbroad as to render the
17 Request unintelligible.

18 Without waiving the foregoing objections, Responding Party responds as
19 follows: Given that the Request is unintelligible, Responding Party lacks the ability
20 to admit or deny it, and on that basis denies the Request.

21 **REQUEST FOR ADMISSION NO. 99:**

22 Admit that this was a recorded Zoom meeting.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 99:**

24 Responding Party hereby incorporates the General Objections as though fully
25 set forth herein. Responding Party objects to this Request on the grounds that the
26 entirety of the Request is so vague, ambiguous, and overbroad as to render the Request
27 unintelligible.

28 Without waiving the foregoing objections, Responding Party responds as

1 follows: Given that the Request is unintelligible, Responding Party lacks the ability
2 to admit or deny it, and on that basis denies the Request.

3 **REQUEST FOR ADMISSION NO. 100:**

4 Admit that after the Oct. 14 Meeting, Bell issued the HR Write-Up to Plaintiff
5 and cc'd HR.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 100:**

7 Responding Party hereby incorporates the General Objections as though fully
8 set forth herein. Responding Party objects to this Request on the grounds that the
9 terms "Oct. 14 Meeting" and "HR Write-Up" as defined by Plaintiff, is vague,
10 ambiguous, overbroad, and unduly burdensome. Responding Party further objects that
11 the terms "after" are vague, ambiguous, and overbroad. Responding Party further
12 objects that the Request is compound, containing multiple distinct inquiries within a
13 single request, which is improper under the applicable Rules.

14 **REQUEST FOR ADMISSION NO. 101:**

15 Admit that the HR Write-Up demanded Plaintiff's signature.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 101:**

17 Responding Party hereby incorporates the General Objections as though fully
18 set forth herein. Responding Party objects to this Request on the grounds that the term
19 "HR Write-Up" as defined by Plaintiff, is vague, ambiguous, overbroad, and unduly
20 burdensome. Responding Party further objects that the terms "demanded Plaintiff's
21 signature" are vague, ambiguous, and overbroad.

22 Without waiving the foregoing objections, Responding Party responds as
23 follows: Deny.

24 **REQUEST FOR ADMISSION NO. 102:**

25 Admit that the HR Write-Up used the word "rant" or stated that conduct "that
26 could be construed as a rant" could lead to dismissal.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 102:**

28 Responding Party hereby incorporates the General Objections as though fully

1 set forth herein. Responding Party objects to this Request on the grounds that the term
2 “HR Write-Up” as defined by Plaintiff, is vague, ambiguous, overbroad, and unduly
3 burdensome. Responding Party further objects that the terms “or stated that conduct”
4 “could lead to dismissal” are vague, ambiguous, and overbroad. Responding Party
5 further objects that the Request is compound, containing multiple distinct inquiries
6 within a single request, which is improper under the applicable Rules.

7 **REQUEST FOR ADMISSION NO. 103:**

8 Admit that as of Oct. 14, 2024, Checkmate still had not provided Plaintiff a
9 company laptop.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 103:**

11 Responding Party hereby incorporates the General Objections as though fully
12 set forth herein. Responding Party objects to this Request on the grounds that the term
13 “Checkmate,” as defined by Plaintiff, is vague, ambiguous, overbroad, and unduly
14 burdensome. Responding Party further objects to this Request to the extent it seeks
15 information protected from disclosure by the attorney-client privilege and/or the work
16 product doctrine. Responding Party further objects that the terms “company laptop”
17 are vague, ambiguous, and overbroad.

18 Without waiving the foregoing objections, Responding Party responds as
19 follows: Deny.

20 **REQUEST FOR ADMISSION NO. 104:**

21 Admit that Plaintiff asked to defer responding to the HR Write-Up due to his
22 workload preparing for the October 23 Popeyes demo.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 104:**

24 Responding Party hereby incorporates the General Objections as though fully
25 set forth herein. Responding Party objects to this Request on the grounds that the term
26 “HR Write-Up” as defined by Plaintiff, is vague, ambiguous, overbroad, and unduly
27 burdensome. Responding Party further objects that the terms “asked to defer
28 responding” and “the October 23 Popeyes demo” are vague, ambiguous, and

1 overbroad. Responding Party further objects that the Request is compound, containing
2 multiple distinct inquiries within a single request, which is improper under the
3 applicable Rules.

4 **REQUEST FOR ADMISSION NO. 105:**

5 Admit that Plaintiff mentioned that he hadn't slept in days and stated words to
6 the effect that he was "going crazy" preparing for the demo.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 105:**

8 Responding Party hereby incorporates the General Objections as though fully
9 set forth herein. Responding Party objects to this Request on the grounds that the
10 term the terms "mentioned" and "words to the effect" are vague, ambiguous, and
11 overbroad. Responding Party further objects that the Request is compound,
12 containing multiple distinct inquiries within a single request, which is improper
13 under the applicable Rules.

14 **REQUEST FOR ADMISSION NO. 106:**

15 Admit that you did not agree to postpone responding to the HR Write-Up.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 106:**

17 Responding Party hereby incorporates the General Objections as though fully
18 set forth herein. Responding Party objects to this Request on the grounds that the term
19 "HR Write-Up" and "You," as defined by Plaintiff, is vague, ambiguous, overbroad,
20 and unduly burdensome. Responding Party further objects to this Request to the extent
21 it seeks information protected from disclosure by the attorney-client privilege and/or
22 the work product doctrine. Responding Party further objects that the terms "agree to
23 postpone responding" are vague, ambiguous, and overbroad.

24 Without waiving the foregoing objections, Responding Party responds as
25 follows: Deny.

26 **REQUEST FOR ADMISSION NO. 107:**

27 Admit that you did not acknowledge or address Plaintiff's expressed health
28 issues.

RESPONSE TO REQUEST FOR ADMISSION NO. 107:

Responding Party hereby incorporates the General Objections as though fully set forth herein. Responding Party objects to this Request on the grounds that the terms “HR Write-Up” and “You,” as defined by Plaintiff, is vague, ambiguous, overbroad, and unduly burdensome. Responding Party further objects to this Request to the extent it seeks information protected from disclosure by the attorney-client privilege and/or the work product doctrine. Responding Party further objects that the terms “did not acknowledge or address” and “health issues” are vague, ambiguous, and overbroad. Responding Party further objects that the Request is compound, containing multiple distinct inquiries within a single request, which is improper under the applicable Rules.

REQUEST FOR ADMISSION NO. 108:

Admit that Plaintiff was terminated on November 14, 2024, within one month of the Oct. 14 DM and HR Write-Up.

RESPONSE TO REQUEST FOR ADMISSION NO. 108:

Responding Party hereby incorporates the General Objections as though fully set forth herein. Responding Party objects to this Request on the grounds that the terms “Oct. 14 DM” and “HR Write-Up,” as defined by Plaintiff, is vague, ambiguous, overbroad, and unduly burdensome. Responding Party further objects that the terms “was terminated” are vague, ambiguous, and overbroad. Responding Party further objects that the Request calls for a legal conclusion rather than a factual response. Responding Party further objects that the Request is compound, containing multiple distinct inquiries within a single request, which is improper under the applicable Rules.

REQUEST FOR ADMISSION NO. 109:

Admit that in Checkmate’s Answer, you admitted that Plaintiff raised BYOD issues.

RESPONSE TO REQUEST FOR ADMISSION NO. 109:

1 Responding Party hereby incorporates the General Objections as though fully
2 set forth herein. Responding Party objects to this Request on the grounds that the term
3 “Checkmate” and “You,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
4 unduly burdensome. Responding Party further objects to this Request to the extent it
5 seeks information protected from disclosure by the attorney-client privilege and/or
6 the work product doctrine. Responding Party further objects that the terms “BYOD
7 issues” are vague, ambiguous, and overbroad. Responding Party further objects that
8 the Request calls for a legal conclusion rather than a factual response.

9 **REQUEST FOR ADMISSION NO. 110:**

10 Admit that in declarations filed by Agarwal and/or Brown, you stated that the
11 Oct. 14 meeting was convened due to a “barrage of over 40 Slack messages”.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 110:**

13 Responding Party hereby incorporates the General Objections as though fully
14 set forth herein. Responding Party objects to this Request on the grounds that the
15 terms “You” and “Oct. 14 Meeting,” as defined by Plaintiff, is vague, ambiguous,
16 overbroad, and unduly burdensome. Responding Party further objects to this Request
17 to the extent it seeks information protected from disclosure by the attorney-client
18 privilege and/or the work product doctrine. Responding Party further objects that the
19 terms “declarations filed” are vague, ambiguous, and overbroad. Responding Party
20 further objects that the Request is compound, containing multiple distinct inquiries
21 within a single request, which is improper under the applicable Rules.

22 **REQUEST FOR ADMISSION NO. 111:**

23 Admit that Plaintiff re-raised the BYOD issue in these Slack messages.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 111:**

25 Responding Party hereby incorporates the General Objections as though fully
26 set forth herein. Responding Party objects to this Request on the grounds that the
27 terms “these Slack messages” are so vague, ambiguous, and overbroad as to render
28 the Request unintelligible. Responding Party further objects that the terms “re-raised”

1 and “BYOD issue” are vague, ambiguous, and overbroad. Responding Party further
2 objects that the Request calls for a legal conclusion rather than a factual response.

3 Without waiving the foregoing objections, Responding Party responds as
4 follows: Given that the Request is unintelligible, Responding Party lacks the ability
5 to admit or deny it, and on that basis denies the Request.

6 **REQUEST FOR ADMISSION NO. 112:**

7 Admit that in declarations filed by Agarwal and/or Brown, you acknowledged
8 issuance of a final warning / formal write-up to Plaintiff on October 14, 2024.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 112:**

10 Responding Party hereby incorporates the General Objections as though fully
11 set forth herein. Responding Party objects to this Request on the grounds that the term
12 “You,” as defined by Plaintiff, is vague, ambiguous, overbroad, and unduly
13 burdensome. Responding Party further objects to this Request to the extent it seeks
14 information protected from disclosure by the attorney-client privilege and/or the work
15 product doctrine. Responding Party further objects that the terms “declarations filed”
16 and “issuance of a final warning / formal write-up” are vague, ambiguous, and
17 overbroad. Responding Party further objects that the Request is compound, containing
18 multiple distinct inquiries within a single request, which is improper under the
19 applicable Rules.

20 **REQUEST FOR ADMISSION NO. 113:**

21 Admit that the May Slack Thread termination statements immediately followed
22 Plaintiff’s message objecting to BYOD legality.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 113:**

24 Responding Party hereby incorporates the General Objections as though fully
25 set forth herein. Responding Party objects to this Request on the grounds that the term
26 “May Slack Thread,” as defined by Plaintiff, is vague, ambiguous, overbroad, and
27 unduly burdensome. Responding Party further objects that the terms “termination
28 statements” and “Plaintiff’s message objecting to BYOD legality” are vague,

1 ambiguous, and overbroad. Responding Party further objects that the Request calls
2 for a legal conclusion rather than a factual response.

3 Without waiving the foregoing objections, Responding Party responds as
4 follows: Deny.

5 **REQUEST FOR ADMISSION NO. 114:**

6 Admit that the HR Write-Up was issued the same day Plaintiff sent the Oct. 14
7 DM regarding BYOD.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 114:**

9 Responding Party hereby incorporates the General Objections as though fully
10 set forth herein. Responding Party objects to this Request on the grounds that the
11 terms “HR Write-Up” and “Oct. 14 DM,” as defined by Plaintiff, are vague,
12 ambiguous, overbroad, and unduly burdensome. Responding Party further objects that
13 the terms “BYOD” are vague, ambiguous, and overbroad.

14 Without waiving the foregoing objections, Responding Party responds as
15 follows: Deny.

16 **REQUEST FOR ADMISSION NO. 115:**

17 Admit that Checkmate did not offer a company laptop or reimburse a separate
18 device at any time between May 1 and October 14, 2024.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 115:**

20 Responding Party hereby incorporates the General Objections as though fully
21 set forth herein. Responding Party objects to this Request on the grounds that the term
22 “Checkmate,” as defined by Plaintiff, is vague, ambiguous, overbroad, and unduly
23 burdensome. Responding Party further objects to this Request to the extent it seeks
24 information protected from disclosure by the attorney-client privilege and/or the work
25 product doctrine. Responding Party further objects that the terms “company laptop”
26 and “reimburse a separate device” are vague, ambiguous, and overbroad. Responding
27 Party further objects that the Request is compound, containing multiple distinct
28 inquiries within a single request, which is improper under the applicable Rules.

1 **REQUEST FOR ADMISSION NO. 116:**

2 Admit that the attached Exhibit A is an accurate transcript of the May Slack
3 threads.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 116:**

5 Responding Party hereby incorporates the General Objections as though
6 fully set forth herein. Responding Party objects to this Request on the grounds that
7 the term “May Slack Threads,” as defined by Plaintiff, is vague, ambiguous,
8 overbroad, and unduly burdensome. Responding Party further objects that the terms
9 “accurate transcript” are vague, ambiguous, and overbroad.

10 Without waiving the foregoing objections, Responding Party responds as
11 follows: Deny.

12
13
14 Date: October 10, 2025

K&L GATES LLP



15
16 _____
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25
26 *Attorneys for Defendant and Counter-*
27 *Claimant CHECKMATE.COM IN*
28

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California, over the age of eighteen years, and not a party of the within action. My business address is 10100 Santa Monica Blvd. 8th Floor Los Angeles, CA 90067.

On **October 10, 2025** , I served the foregoing document(s) described as:

- **CHECKMATE.COM, INC.'S RESPONSES TO PLAINTIFF ARJUN VASAN'S THIRD SET OF REQUESTS FOR ADMISSIONS**

on the interested parties in this action as follows:

Arjun Vasan
Email: arjun.vasan@gmail.com

Plaintiff Pro Se



(BY ELECTRONIC MAIL) Pursuant to C.R.C. 2.251 or agreement by all parties, I served the described document(s) by emailing it to each of the aforementioned electronic mail addresses and the transmission was reported as complete and without error.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on **October 10, 2025**, at Los Angeles, California.

/s/Nicole Adasha
Nicole Adasha